Jennifer L. Braster 1 Nevada Bar No. 9982 NAYLOR & BRASTER 2 1050 Indigo Drive, Suite 200 Las Vegas, NV 89145 3 (T) (702) 420-7000 (F) (702) 420-7001 4 ibraster@naylorandbrasterlaw.com 5 Attorneys for Defendant Experian Information Solutions, Inc. 6 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 10 MICHAEL CALKINS, Case No. 2:16-cv-02628-RFB-VCF 11 Plaintiff, 12 STIPULATION TO CONTINUE 13 **DISPOSITIVE MOTION DEADLINE AS** PORTFOLIO RECOVERY ASSOCIATES. TO EXPERIAN INFORMATION 14 LLC, a foreign limited liability company; and **SOLUTIONS, INC.** EXPERIAN INFORMATION SERVICES, 15 [FOURTH REQUEST] INC. 16 Defendants. Complaint filed: November 15, 2016 17 Plaintiff Michael Calkins ("Plaintiff") and Defendants Experian Information Solutions, 18 Inc. ("Experian") and Portfolio Recovery Associates, LLC ("Portfolio") by and through their 19 respective counsel, hereby move the Court to request a 14-day extension of the dispositive motion 20 deadline currently set for November 20, 2017 as to Experian.<sup>1</sup> 21 Good cause exists to grant this extension as Defendant Experian is currently engaged in 22 settlement discussions with Plaintiff which are aimed at resolving this case as to Experian in full. 23 An extension of the dispositive motion deadline will give the parties additional time to pursue all 24 25 <sup>1</sup> The parties previously entered into two stipulations to extend discovery and dispositive motion deadlines. (ECF Nos. 21 and 23). Thereafter, at the hearing on Portfolio's motion for 26 protective order held on October 5, 2017, the Court ordered the dispositive motion deadline be

extended to November 20, 2017. Therefore, the parties are treating this as the Fourth Request to

NAYLOR & BRASTER ATTORNEYS AT LAW 1050 Indigo Drive, Suite 200 Las Vegas, NV 89145 (702) 420-7000

27

extend the dispositive motion deadline.

1	settlement possibilities before incurring the costs associated with preparing dispositive motions.	
2	As such, Plaintiff, Experian, and Portfolio respectfully request a 14-day extension of the	
3	dispositive motion deadline for Experian making the new deadline December 4, 2017.	
4	Dated this 15th day of November 2017.	
5 6	THE LAW OFFICE OF VERNON NELSON	Naylor & Braster
7 8 9 10 11 12 13 14 15 16	By: /s/ Vernon A. Nelson Vernon A. Nelson, Jr. Nevada Bar No. 6434 9480 S. Eastern Ave., Ste. 244 Las Vegas, NV 89123  Attorneys for Plaintiff Michael Calkins  KRAVITZ, SCHNITZER, & JOHNSON, CHTD.  By: /s/ Gina M. Mushmeche Gina M. Mushmeche Nevada Bar No. 10411 8985 S. Eastern Ave., Suite 200 Las Vegas, NV 89123	By: /s/ Jennifer L. Braster Jennifer L. Braster Nevada Bar No. 9982 1050 Indigo Drive, Suite 200 Las Vegas, NV 89145  Attorneys for Defendant Experian Information Solutions, Inc.
17 18 19	Attorneys for Portfolio Recovery Associates LLC	;
20	IT IS SO ORDERED.	
21		Controle
22	Dated: 11-16-2017	HONORABLE CAM FERENBACH
23		United States Magistrate Judge
24		
25		
26		
27		

NAYLOR & BRASTER ATTORNEYS AT LAW 1050 Indigo Drive, Suite 200 Las Vegas, NV 89145 (702) 420-7000

28